

Madison industries inc.

C-99-06-07

June 11, 1999

Mr. John Osolin
Project Manager
U.S. Environmental Protection Agency
Region II, New Jersey Superfund Branch
290 Broadway
New York, NY 10007-1866

RE: **Classification Exception Area Analysis**

Dear Mr. Osolin:

In accordance with the requirements of the New Jersey Department of Environmental Protection (NJDEP), Madison Industries, Inc. (Madison) is pleased to submit a copy of the Classification Exception Area (CEA) Analysis. This CEA analysis was prepared by Madison pursuant to N.J.A.C. 7:9-6.

In reviewing this CEA, it is important to note that other potential sources of elevated levels of metals in groundwater are prevalent in the area including, but not limited to, the City of Perth Amboy's Runyon water treatment facility. This facility, located on the Runyon Watershed in the Township, produces a large amount of water treatment sludge (redcake) from the removal (by precipitation) of naturally occurring iron in the groundwater. The associated water treatment lagoons, unlined sludge storage, and sludge mixing/handling areas are identified on Figure 1.

The City of Perth Amboy has had a history of violations related to the improper handling of water treatment sludges and discharges of lagoon effluents to Pricketts Brook and Tennent Pond and has been cited numerous times for these violations. As recently as December 1997, NJDEP enforcement personnel observed the City of Perth Amboy discharging lagoon supernatant and filter backwash solution directly to Pricketts Brook. The sludge in these lagoons has been known to contain concentrations of zinc as high as 24,300 milligrams per kilogram (mg/kg). [Ref: *Runyon Water Treatment Plant Residual Solids Impact Evaluation, Killam Associates, August 1994, page 5-1*]. In July 1991 and June 1992, the City of Perth Amboy reported the concentration of zinc in the water treatment sludge at 11,600 mg/kg and 4,167 mg/kg, respectively. [Ref: *Well No. 5 Evaluation of Alternatives, Killam Associates, November 1992, revised April 1993, Appendix A, Table I-16*]. The sludge concentration in the clarifier blowdown ranges from 1,000 mg/l to 1,500 mg/l and the filter backwash is reported to have maximum first flush concentration of approximately 1,300 mg/l; average backwash concentration is estimated to be 25 mg/l. [Ref: *Well No. 5 Evaluation of Alternatives, Killam Associates, November 1992, revised April 1993, page I-10*]. On April 3, 1998, the NJDEP found that the aforementioned unpermitted discharge was a MAJOR violation and in complete contravention of the City of Perth Amboy's May 31, 1991 Administrative Consent Order (ACO) wherein the City of Perth Amboy agreed to cease all discharges from the settling basins (lagoons). The City of Perth Amboy was subsequently assessed a \$45,000 penalty for this violation.

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If you have any questions regarding this CEA, please do not hesitate to contact me.

Sincerely,

MADISON INDUSTRIES, INC.

A handwritten signature in black ink, appearing to read "B. J. Vroeginday", written over the printed name.

Barry J. Vroeginday, CPG
Director, Environmental Site Remediation

cc: Susan Gieser, Esq., Madison Industries
Paul Harvey, NJDEP